

STATE OF WISCONSIN:

BEFORE THE GOVERNMENT ACCOUNTABILITY BOARD

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IN THE MATTER of the Nomination  
Papers Filed for Gary R. George with  
Respect to the August 12, 2014 Primary  
Election and November 4, 2014 General Election  
for Wisconsin's 4<sup>th</sup> Congressional District

Case No. \_\_\_\_\_

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RESPONSE

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NOW COMES Gary R. George, for the Gary George for Congress Campaign, who responds to the Complaint filed June 5, 2014, as follows:

1. Respondent has no knowledge of Par. 1 of Complaint.
2. Respondent admits Par. 2-5 of Complaint.
3. Par 6-9, 12 and 16 of the Complaint are under a section entitled "CHALLENGES TO CIRCULATOR INFORMATION". However, no allegation of disqualification of any circulator listed in Par. 6-16 is alleged.
4. Affidavit of Correction of Mr. Tyrone Daniels, detailed in Par. 10 was signed by Mr. Daniels on June 3<sup>rd</sup>, 2014.
5. The affidavit referenced in Par. 4 above was accepted by the Government Accountability Board (GAB) staff on June 3, 2014. See Affidavit of Corey Daniels (attached).
6. Affidavit of Mr. Carter, detailed in Par. 11, was signed by Mr. Carter on June 3<sup>rd</sup>, 2014. See Affidavit of Anthony Carter (attached).
7. Par. 14-15 denied. See Affidavits of Correction filed with and accepted by GAB staff.
8. Attached to this Response or filed separately are the Affidavits of Tyrone Daniels, Corey Daniels and Eleanor Henderson, with the Affidavit of Anthony Carter anticipated to be filed by Monday, June 9, 2014.

DISCUSSION

The Certification of Circulator on Form GAB-168, nomination paper for partisan office, referencing state statutes.

The Complaint does not allege a disqualification based on Wis. Stat. § 6.03. Therefore, it fails to allege a basis to set aside nomination paper pages referenced in Par. 6-9, 12 and 16 of the Complaint. Therefore, these challenges should be stricken and dismissed. A citizen is qualified to circulate if 18 years or older and not currently serving a sentence or on extended supervision. No such allegation is made in the Complaint.

The affidavits of correction cited in Par. 11 and 12 are valid. An error in the affidavit of the notary is correctable, upon information and belief, according to the Department of Financial Institutions (see attached Corey Daniels Affidavit) and does not change the validity of the affidavit with the signature of the affiant. Mr. Daniels and Mr. Carter, as stated in the Complaint at Par. 11 and 12, signed the affidavits of correction on June 3, 2014, and each was properly filed and accepted by GAB staff on June 3, 2014.

The circulators have collected and there have been filed sufficient signatures to qualify the name of Gary R. George for Congress, 4<sup>th</sup> Seat for the ballot Aug. 12 and Nov. 4, 2014. The public interest is in ballot access. The Complaint should be dismissed as frivolous and attorney's fees of \$500 should be assessed against Complainant.

Signed this 6<sup>th</sup> day of June, 2014

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By: Gary R. George  
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State Bar No. 1004216  
On behalf of the Gary R. George  
Campaign and Circulators

State of Wisconsin  
County of ~~Milwaukee~~ Ozaukee

Gary R. George, duly sworn and under oath,  
came before me and signed his name on this  
Affidavit, this 6 day of June, 2014

Debra Schanen

Notary Public

My Commission is permanent/expires 4/10/14

